

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S EMERGENCY MOTION FOR PERMISSION TO SEAL DOCUMENT AT
LEVEL II**

1. I, the plaintiff, hereby move to seal or ask permission of the court to file a sealed financial affidavit document, pursuant to Fed. Civ. Rule 83(c), on an emergency or expedited basis.
2. The factual and legal basis to justify sealing is based on the fact that the financial affidavit is confidential and contains private and confidential information including sensitive financial information, which if disclosed publicly would impair the privacy interests attached thereto. This involves private sensitive information that will be prejudicial to me if disclosed. I am seeking permission to seal this financial document here because I do not want any surprises or to be blindsided by having my information exposed unilaterally, against my intent. [NB: If disclosed, my private information will likely be exploited.]. I also believe there is some precedent for sealing private financial information.
3. Upon the granting of this motion seeking permission, I will then file the financial affidavit under Level II seal. Given the history of this case, I believe this is the most prudent approach i.e. to seek permission first before actually filing the confidential document in order to avoid any situation where my private information could be exposed without my knowing that it will be disclosed.
4. I request that the financial affidavit be sealed permanently or indefinitely. See Fed. Civ. Rule 83(c).
5. I request Level II sealing with the filing sealed at Level II to be reviewed only by the judge.
6. I intend to utilize the financial affidavit to support my renewed motions for transcript, for waiver of pace fees and for appointment of counsel, as previously indicated to the court I would do.¹
7. Given the nature of the matter, I do not believe that seeking concurrence from the defendants is required.

¹ NB: I also previously sought clarification but the court stated that it would not clarify the motion. So I am filing this motion in this manner so that the court has a motion to seal that it can address specifically.

8. This is an emergency because it is related to time-sensitive matters that affects the proceedings of this case.
9. Please grant a pro se liberal construction to this pleading.
10. WHEREFORE, I, the plaintiff, respectfully request that this Honorable Court grant this Motion to Seal or such further relief as may be deemed just and proper.

Respectfully submitted,
/s/ Andre Bisasor
Andre Bisasor

May 31, 2024

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor
Andre Bisasor